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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SIDNEY NAIMAN, individually
and on behalf of all others similarly
situated,

Plaintiff,

vs.

MCIHAEL MILLER INSURANCE
COMPANY; and DOES 1 through
10, inclusive, and each of them,

Defendant.

Case No.: 4:21-cv-04883-DMR

**JOINT STIPULATION FOR
CONTINUANCE OF INITIAL CASE
MANAGEMENT CONFERENCE AND
DEFENDANT'S RESPONSIVE
PLEADING AND ORDER (AS
MODIFIED)**

HON. DONNA M. RYU

DATE: SEPTEMBER 29, 2021

NEW DATE: DECEMBER 1, 2021

JOINT STIPULATION

WHEREAS, the instant matter was filed on July 14, 2021 [Dkt. 1];

WHEREAS, on September 2, 2021, the Parties stipulated to extend
Defendant's time to respond to the Complaint to October 1, 2021 [Dkt. 7];

WHEREAS, the Court set an initial case management conference for
September 29, 2021, with a joint report due September 22, 2021 [Dkt. 5];

WHEREAS, as Defendant has just appeared in this action, the case is not at

JOINT STIPULATION TO CONTINUE THE INITIAL CASE MANAGEMENT CONFERENCE & ORDER

1 issue such that the Parties request the case management conference be continued
2 by 63 days to provide time for the Parties to exchange information and meet and
3 confer about the matter;

4 WHEREAS, Defendant additionally wishes for a further extension of 30
5 days on its responsive pleading deadline while the Parties exchange information;

6 WHEREAS, good cause exists for such extension in the interests of judicial
7 economy and cost savings, as permitting the Parties to further explore an
8 exchange of information and engage in settlement discussions prior to incurring
9 the costs associated with the scheduling conference will facilitate such
10 discussions.

11 Thus, the parties jointly stipulate that:

12 The scheduling conference set for September 29, 2021 be vacated, and
13 continued to December 1, 2021, or a later date that is convenient to this Court and
14 the joint status report be due seven (7) days before the new date.

15 Defendant's responsive pleading deadline is extended to November 3, 2021.

16 **SO STIPULATED.**

17 //

1 Dated: September 21st, 2021

Respectfully submitted,

2 By: s/Todd M. Friedman
3 Todd M. Friedman, Esq.
4 Attorney for Plaintiff

5 BY: s/ Michael J. Fish
6 Lisa Garcia, Esq.
7 Attorneys For Defendant

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JOINT STIPULATION TO CONTINUE THE INITIAL CASE MANAGEMENT CONFERENCE & ORDER

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained authorization to affix counsel for Defendant's electronic signature to this document.

Dated: September 21st, 2021

Respectfully submitted,

Law Offices of Todd M. Friedman, P.C.

By: s/ Todd M. Friedman
Todd M. Friedman, Esq.
Attorney for Plaintiff

1 Filed electronically on this 21st Day of September, 2021, with:

2 United States District Court CM/ECF system.

3 Notification sent electronically on this 21st Day of September, 2021, to:

4 Honorable Donna M. Ryu

5 United States District Court

6 Northern District of California

7 And All Counsel of Record as Recorded On The Electronic Service List

8
9 /s/ Todd M. Friedman, Esq.

10 TODD M. FRIEDMAN

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4 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

5 SIDNEY NAIMAN, individually
6 and on behalf of all others similarly
7 situated,

8 Plaintiff,

9 vs.

10 MCIHAEL MILLER INSURANCE
11 COMPANY; and DOES 1 through
12 10, inclusive, and each of them,

13 Defendant.

Case No.: 4:21-cv-04883-DMR

ORDER (AS MODIFIED)
GRANTING JOINT
STIPULATION FOR
CONTINUANCE OF INITIAL
CASE MANAGEMENT
CONFERENCE AND
DEFENDANT'S RESPONSIVE
PLEADING

14
15 **ORDER (AS MODIFIED)**

16 Pursuant to the Stipulation of the Parties, and for GOOD CAUSE:

17 The initial case management conference set for September 29, 2021 is
18 vacated and reset for December 1, 2021 at 10:00 a.m. by Zoom video
19 conference.

20 The parties shall file their joint case management conference statement by
21 November 24, 2021.

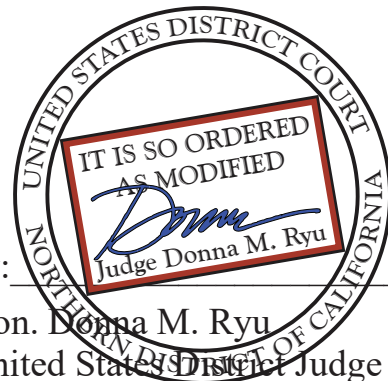
22 Defendant's responsive pleading shall be due by November 3, 2021.

23
24 **IT IS SO ORDERED AS MODIFIED.**

25
26 Dated: September 21, 2021

27 By: _____

28 Hon. Donna M. Ryu
United States District Judge



ORDER (AS MODIFIED)